



February 1, 2017

Via Email and Fed Ex

Mr. Russell Fish  
Office of Remediation 3LC20  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Subject: Quarterly Progress Report  
Honeywell International Inc.  
Delaware Valley Works  
Claymont, DE  
Docket No. RCRA 03-2011-0252CA**

Dear Mr. Fish:

On behalf of Honeywell International Inc. (Honeywell), Amec Foster Wheeler Environment & Infrastructure, Inc. (AMEC), is submitting this Quarterly Progress Report for the activities conducted by Honeywell at its Delaware Valley Works (DVW) in Claymont, Delaware. This report is being submitted in accordance with the requirements outlined in Section VI (D)(3) of the Administrative Order on Consent, Docket No. RCRA 03-2011-0252CA. This report covers the period from November 2, 2016 to February 1, 2017.

**A. Identification of Site**

Honeywell – Delaware Valley Works  
6100 Philadelphia Pike  
Claymont, Delaware 19703

**B. Status of Work and Progress to Date**

- We are awaiting USEPA's approval of the *Upper Sluiceway IRM Completion Report* submitted to USEPA by GCC's consultant Cummings/Riter Consultants, Inc. (Cummings/Riter) on November 22, 2013.
- On April 18, 2016 the *DVW RCRA Facility Investigation Report*, *Baseline Human Health Risk Assessment*, and *Baseline Ecological Risk Assessment* were submitted to USEPA. We are awaiting USEPA's comments on or approval of these documents.
- On November 1, 2016 the twenty-first quarterly status report was submitted to USEPA.
- On November 8, 2016 Honeywell and Chemtrade submitted to USEPA a revised Final Work Plan for Delineation of Sediment Impacts adjacent to the Marcus Hook Industrial Complex. (MHIC). The revisions were made to address USEPA comments issued on

**Amec Foster Wheeler Environment & Infrastructure, Inc.**  
751 Arbor Way, Suite 180  
Blue Bell, PA 19422-1951  
610-828-8100 office  
610-828-6700 fax  
www.amecfw.com

October 25, 2016. The field sampling commenced with a bathymetric survey on December 19, followed by sediment sampling on December 20 and 21, 2016.

- Honeywell and Chemtrade implemented the Supplemental Pathway Investigation to assess the fate of arsenic in groundwater commencing on October 31 and ending on December 9, 2017. This included installation of monitoring wells, collection of groundwater, sediment, surface water and pore water samples for arsenic speciation analysis and other relevant parameters; and collection of hydraulic conductivity data. Due to difficulty encountered in collection of pore water, field modifications to the targeted pore water recovery volume were proposed in a memorandum transmitted to USEPA on November 8.
- On October 18, 2016 USEPA provided via email its review comments on the *30% Design Interim Measure Work Plan – Lower Sluiceway, Shoreline and Sediment*. On November 2, Honeywell and Chemtrade returned their responses to EPA comments via email.

**C. Difficulties Encountered During Reporting Period**

- Difficulty was encountered in collection of a sufficient volume of sediment pore water by the method outlined in the approved Supplemental Pathway Investigation Work Plan.

**D. Actions Taken to Rectify Difficulties**

- Field modifications were proposed to USEPA and DNREC, which were approved and implemented.

**E. Activities Planned for Next Quarter**

- USEPA approval of the DVW RFI Report, BHHRA and BERA.
- Submit a report of the findings of the Supplemental Pathway Investigation.
- Submit a report of the findings of the Delineation of Sediment Impacts adjacent to the MHIC.
- Continue preparation of the 90% *Design Interim Measure Work Plan – Lower Sluiceway, Shoreline and Sediment*.
- Continue preparation of DNREC Subaqueous Lands Permit Application.
- Continue preparation of New Castle County Floodplain Permit Application (if needed).
- Continue preparation of USACE Nationwide Permit 38 application.

**F. Explanation of Any Non-Compliance**

- None this period

**G. Discussion of Performance Evaluation of Remedial Measures**

- Not applicable.

Attached to this letter is the certification by Honeywell as required by the Administrative Order on Consent, Docket No. RCRA 03-2011-0252CA. Please contact Richard C. Karr at 610-877-6154 if you require additional information.

Sincerely,  
**Amec Foster Wheeler Environment & Infrastructure, Inc.**



Richard C. Karr  
Branch Manager/Sr. Associate Geologist

cc: Russell Fish – USEPA  
Steve Coladonato – Honeywell  
Nelson Johnson – Arnold & Porter  
Rus Davis – Honeywell  
Keith Shuler – Honeywell  
Lawrence Matson– DNREC  
James Wentzel, P.E. – PADEP

### CERTIFICATION

I certify that the information contained in or accompanying this Quarterly Progress Report is true, accurate, and complete.

As to the identified portion of this Quarterly Progress Report for which I cannot personally verify its accuracy, I certify under penalty of law that this Report and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment for knowing violations.

Signature: \_\_\_\_\_



Name: Steve Coladonato

Title: Remediation Manager, Honeywell International Inc.